

IN THE UNITED STATES DISTRICT COURT FOR THE
 EASTERN DISTRICT OF VIRGINIA
 Alexandria Division

UNITED STATES OF AMERICA) CRIMINAL NO. 1:16-cr-215
)
 v.) Honorable Liam O'Grady
 GENNARO MATTIACCIO,)
)
 Defendant) Trial Date: January 17, 2017
)

GOVERNMENT'S TRIAL EXHIBIT LIST

The United States of America, by and through its attorneys, Dana J. Boente, United States Attorney for the Eastern District of Virginia, Kimberly R. Pedersen and Samantha P. Bateman, Assistant United States Attorneys, hereby submits its list of trial exhibits.

Exh. No.	Description	Bates Number	Offer	Admit
	<u>Social Security Administration Records</u>			
1-0	ICLM Summary (2/1/2013)	US-00036643-36645		
1-1	Application for Disability Insurance Benefits (2/5/2013)	US-0008381-8382		
1-2	Amendments to Application (3/19/2013)	US-0008413-8414		
1-3	Function Report (7/15/2013)	US-0008181-8191		
1-4	Request for Reconsideration (9/16/2013)	US-0008383		
1-5	Function Report (10/21/2013)	US-0008421-8428		
1-6	Disability Report – Appeal Form SSA-3441 (9/15/2013)	US-0008252-8259		

1-7	Request for Hearing by ALJ (12/13/2013)	US-0008384-8385		
1-8	Disability Report – Appeal Form SSA-3441 (12/18/2013)	US-008406-8412		
1-9	Daily Activities Questionnaire (12/26/2013)	US-0008550-8554		
1-10	Disability Report, Form SSA-3368	US-0008000-8006		
1-11	Work History Report, Form SSA-3369	US-0008007-8015		
1-12	Report of Continuing Disability Interview, Form SSA-454 (5/16/2016)	US-0007983-7996		
1-13	Continuing Disability Review Report Form SSA-454	US-00032589- 32594		
1-14	ALJ Hearing Audio Recording (approx. 50 minutes) (3/20/2014)	US-0007997		
1-14A	ALJ Hearing Transcript (3/20/2014)	US-00039490 - 39545		
1-15	Disability Determination Explanation – Initial Level (9/3/2013)	US-0008228-8239		
1-16	SSA ODAR Letter to Mattiaccio Notice of Disapproved Claim (9/4/2013)	US-0008241-8245		
1-17	Disability Determination Explanation – Reconsideration Level (11/27/2013)	US-008354-8370		
1-18	SSA Notice of Reconsideration (11/27/2013)	US-0008372-8374		
1-19	SSA ODAR Letter to Mattiaccio (12/24/2013)	US-0008386-8405		
1-20	SSA ODAR Notice of Hearing (2/10/2014)	US-0008646-8663		
1-21	SSA ODAR Notice of Decision – Fully Favorable (3/25/2014)	US-0008721-8733		
1-22	Disability Determination Transmittal (4/11/2014)	US-0008734-8735		
1-23	Disability Determination Explanation – DIB Claim at the CDR – Initial Level (6/9/2016)	US-0032451- 32460		

1-24	SSA Retirement, Survivors & Disability Insurance Letter to Mattiaccio (6/9/2016)	US-00032602-32605		
1-25	SSA ODAR Unfavorable – Initial Adult Decision (11/15/2016)	US-0037363-37383		
1-26	SSA Master Beneficiary Record	US-005746-5747		
1-27	Work History Report, Form SSA-3369	US-0008007-8015		
1-28	Work History Report (7/15/2013)	US-0008192-8200		
1-29	Pain Questionnaire (7/15/2013)	US-0008201-8206		
1-30	Function Report – Adult, Third Party (7/15/2013)	US-0008207-8221		
1-31	Function Report – Adult, Third Party (10/23/2013)	US-0008339-8353		
1-32	Exhibit No. 15F (Progress Notes)	US-0008664-8673		
1-33	Exhibit No. 11D (2012 U.S. Individual Income Tax Return)	US-0008706-8717		
1-34	SSA Overpayment Calculation	US-0038627		
1-35	Form SSA-820-BK (blank)	US-0039329-39336		
	<u>DC Honeybees Records</u>			
2-1	YouTube screenshot, DC Honeybees TV (11/12/13) “Our Second Trip to Florida”	US-0032838-32839		
2-2	YouTube screenshot, DC Honeybees TV (8/24/12) “Tagging Along with a Commercial Beekeeper”	US-0032840-32841		
2-3	YouTube screenshot, DC Honeybees TV (Sept 2014) “Trip to Florida, Day 1”	US-0032842-32843		
2-4	YouTube screenshot, DC Honeybees TV (9-29-13) “Commercial Beekeeping in FLA”	US-0032844-32845		
2-5	YouTube screenshot, DC Honeybees TV (3-26-13) “We Package Bees for Transport North”	US-0032846-32847		
2-6	YouTube screenshot, DC Honeybees TV (1-18-12) “Commercial Pollination in Florida”	US-0032848-32849		

2-7	YouTube screenshot, DC Honeybees TV (9- 17-14) “Trip to Florida, Day 1”	US-0032850		
2-8	YouTube screenshot, DC Honeybees TV (1-18-13) “Commercial Pollination in Florida”	US-0032851		
2-9	YouTube screenshot, DC Honeybees TV (September 2013) “Our Trip to Florida”	US-0032852		
2-10	YouTube screenshot, DC Honeybees TV (3-26-13) “We Package Bees for Transport North”	US-0032853		
2-11	YouTube screenshot, DC Honeybees TV (8-24-12) “Tagging Along with a Commercial Beekeeper”	US-0032854		
2-12	YouTube screenshot, DC Honeybees TV (11-12-13) “Our Second Trip to Florida to Check on the Bees”	US-0032855		
2-13	Video, DC Honeybees TV (3/26/13) “We Package Bees for Transport North”	US-0032831		
2-14	Video, DC Honeybees TV (9/29/13) “Commercial Beekeeping in FLA”	US-0032833		
2-15	Video (1/18/13) “Commercial Pollination in Florida”	US-0032834		
2-16	Video, DC Honeybees TV (Sept 2014) “Trip to Florida, Day 1”	US-0032835		
2-17	Video, DC Honeybees TV (11/12/13) “Our Second Trip to Florida”	US-0032836		
2-18	Video (8/24/12) “Tagging Along with a Commercial Beekeeper”	US-0032837		
	<u>Beesource.com Records</u>			
3-1	“matt1954” posts (9/24/2010 – 1/2/2016)	US-0002744-2855		
3-2	“matt1954” Registration IP Address	US-0002856		
3-3	“matt1954” user profile	US-0002857-2859		

3-4	Beesource.com (The Birkey Group) Certification of Authenticity of Business Records	US-0035699		
3-5	“matt1954” private messages (matt1954PMs)	US-0038732-38776		
3-6	Transaction Details (matt1954_PP1)	US-0038777		
3-7	“matt1954” posts (12/25/016-1/2/2016) (matt1954documents)	US-38727-38731		
3-8	“matt1954” posts (9/24/2010 – 12/25/2015) (Forum Name)	US-0038642-38726		
3-9	Beesource.com (The Birkey Group) Certification of Authenticity of Business Records (1/5/2017)	US-0038641		
	<u>Whole Foods Records</u>			
4-1	Spreadsheet	US-0039566		
4-2	Spreadsheet	US-0039635		
4-3	Spreadsheet	US-0035051		
4-4	Whole Foods Certification of Authenticity of Business Records	US-0037663		
	<u>Texas Insurance & Financial Services Records</u>			
5-1	Insurance Policy (12/9/2014 - 12/9/2015)	US-0037162-37224		
5-2	Produce Source Partners, Certificate of Insurance Request	US-0037135		
5-3	Policy Changes, effective 6/11/2015	US-0037017-37025		
5-4	Letter to Insured (7/8/2015)	US-0037040		
5-5	Package Confirmation of Coverage & Renewal Quotation	US-0037081-37087		
5-6	Policy Changes, effective 12/26/2013	US-0037102		
5-7	Email thread, FW: Flood Insurance (Your Loss)	US-0037048-37052		
5-8	Email thread, FW; Rock Hill Honey Bee Farms	US-0037077-37079		
5-9	Email thread, Mattiaccio – FW: Claim	US-0037088-37090		
5-10	Email thread, Mattiaccio – FW: Insurance on Bee Hives	US-0037091-37093		

5-11	Email thread, Mattiaccio – FW: Insurance Renewal	US-0037094		
5-12	Email thread, RE: Insurance on Bee Hives	US-0037106-37108		
5-13	Email thread, FW: New Wording for COI	US-0037133-37134		
5-14	Email thread, FW: Pumpkins, Pumpkins and more Pumpkins	US-0037144-37145		
5-15	Email thread, Mattiaccio – Req from insrd to increase hives FW: Certificates of Insurance	US-0037153-37155		
5-16	Email thread, Req to increase colonies to 400 / FW: Binder	US-0037156-37159		
5-17	Email thread, FW: Overwintering Bees in Florida	US-0037136-37143		
5-18	Email thread, FW: Truck Insurance	US-0037150-37152		
5-19	Texas Insurance & Financial Services Certification of Authenticity of Business Records	US-0037662		
5-20	Farm & Ranch/Bee Data Sheet	US-0037008-37009		
5-21	Email thread & attachments, Rock Hill Honey Bee Farms – 2BA0025 – Endorsement 1	US-0037013-37014		
5-22	Email thread & photo attachments, FW: Rock Hill Bee Farms, Avant Model 528 S/N 74363	US-0037064-37072		
5-23	Email & attachment, Mattiaccio – Req to increase prod liab to \$2mill	US-0037103-37104		
5-24	Email thread, FW: Avant 528 with Pallet Forks Rental Paperwork	US-0037044-37047		
5-25	Insurance Policy (12/9/2011 to 12/9/2012)	US-0039039-39075		
5-26	Policy Changes, effective 7/27/2012	US-0039291-39301		
5-27	Insurance Policy (12/11/2012 to 12/11/2013)	US-0039284		
5-28	AmWINS Binder (12/12/2012)	US-0039285-39288		
5-29	Invoice (8/21/2012)	US-0039289-39290		
5-30	Renewal Quotation (12/9/2013)	US-0039146-39151		
5-31	Package Confirmation of Coverage (12/11/2013)	US-0039152-39159		

5-32	Insurance Policy (12/9/2013 to 12/9/2014)	US-0039160-39214		
5-33	AmWINS Binder (12/12/2011)	US-0039302-39304		
5-34	Evanston Insurance Policy (12/9/2016 to 12/9/2017)	US-0039221-39283		
5-35	Policy Premium and Surplus Lines Tax Summary & Binder -2BA0052 (12/9/2016 to 12/9/2017)	US-0039077-39082		
	<u>Virginia Department of Agriculture and Consumer Services Records</u>			
6-1	Bill of Lading, Rock Hill Honey Bee Farms	US-0037435		
6-2	Apiary Inspection Reports	US-0037404-37416		
6-3	Letter from Mattiaccio & attachments Re: Request for Import Certificate (3/7/2015)	US-0037398-37403		
6-4	Certificate of Apiary Inspection for Out of State (3/22/2016)	US-0037397		
6-5	Florida Apiary Inspection Report	US-0037389		
6-6	VDACS Online Agency Registration System	US-0037390		
6-7	Entry Permit (3/31/2015)	US-0037391		
6-8	Entry Permit (3/23/2016)	US-0037392		
6-9	Entry Permit (4/9/2014)	US-0037393-37394		
6-10	Entry Permit (4/29/2016)	US-0037395-37396		
6-11	Virginia Department of Agriculture & Consumer Services (State Apiarist) Certification of Authenticity of Business Records	US-0038606-38607		
6-12	Apiary Inspection Reports (Sept. 2012)	US-0037384-37387		
6-13	Virginia Department of Agriculture and Consumer Services, Apiary Inspection Report (5/13/2016)	US-00037417-37418		
6-14	National Honey Bee Disease and Pest Survey (5/14/14)	US-00037419-37420		
6-15	National Honey Bee Survey/Funded by USDA/APHIS – Honey Bee Diagnostic Report, Sample ID: VA-02 (7/23/2014)	US-00037421-37425		

6-16	National Honey Bee Survey/Funded by USDA/APHIS – Honey Bee Diagnostic Report, Sample ID: VA-03 (7/23/2014)	US-00037426-37430		
6-17	Bee Disease Diagnosis (9/7/2012)	US-0037388		
	<u>Bank of America Records</u>			
7-1	Account x2954 Statements & Signature Card	US-0002865-2894		
7-2	Account x3870 Statements	US-0002899-3264		
7-3	Account x3870 Signature Card	US-0002895-2897		
7-4	Account x7506 Signature Card	US-0003265-3269		
7-5	Account x7506 Signature Card	US-0034997-34999		
7-6	Account x7506 Statements	US-0003271-3572; US-0005325-5330; US-0005341-5346; US-0005357-5362; US-0005373-5378; US-0005389-5394; US-0005403-5408		
7-7	Check	US-0003573		
7-8	Check	US-0003575		
7-9	Check	US-0003577		
7-10	Check	US-0003591		
7-11	Check	US-0003597		
7-12	Check	US-0003605		
7-13	Check	US-0003607		
7-14	Check	US-0003609		
7-15	Check	US-0003611		
7-16	Check	US-0003613		
7-17	Check	US-0003623		
7-18	Check	US-0003625		
7-19	Check	US-0003633		
7-20	Check	US-0003635		
7-21	Check	US-0003649		
7-22	Check	US-0003659		
7-23	Check	US-0003663		
7-24	Check	US-0003689		

7-25	Check	US-0003695		
7-26	Check	US-0003697		
7-27	Check	US-0003715		
7-28	Check	US-0003719		
7-29	Check	US-0003725		
7-30	Check	US-0003729		
7-31	Check	US-0003731		
7-32	Check	US-0003735		
7-33	Check	US-0003737		
7-34	Check	US-0003757		
7-35	Check	US-0003759		
7-36	Check	US-0003763		
7-37	Check	US-0003765		
7-38	Check	US-0003767		
7-39	Check	US-0003771		
7-40	Check	US-0003789		
7-41	Check	US-0003793		
7-42	Check	US-0003801		
7-43	Check	US-0003805		
7-44	Check	US-0003811		
7-45	Check	US-0003813		
7-46	Check	US-0003821		
7-47	Check	US-0003827		
7-48	Check	US-0003829		
7-49	Check	US-0003837		
7-50	Check	US-0003839		
7-51	Check	US-0003847		
7-52	Check	US-0003855		
7-53	Check	US-0003887		
7-54	Check	US-0003897		
7-55	Check	US-0003907		
7-56	Check	US-0003909		
7-57	Check	US-0003927		
7-58	Check	US-0003929		
7-59	Check	US-0003947		
7-60	Check	US-0003951		
7-61	Check	US-0003983		
7-62	Check	US-0004012-4013		
7-63	Check	US-0004030-4031		

7-64	Check	US-0004054-4055		
7-65	Check	US-0004102-4103		
7-66	Check	US-0004176-4177		
7-67	Check	US-0004462-4463		
7-68	Check	US-0004736-4737		
7-69	Check	US-0004740-4741		
7-70	Check	US-0004754-4755		
7-71	Check	US-0004768-4769		
7-72	Check	US-0004772-4773		
7-73	Check	US-0004846-4847		
7-74	Check	US-0004882-4883		
7-75	Bank of America Certification of Authenticity of Business Records	US-0035334-35335		
	<u>DHA & Employment Records</u>			
8-1	Mattiaccio resume	US-0005414-5416		
8-2	Mattiaccio LinkedIn page	US-0032621-32624		
8-3	Email thread, RE:	US-0022304		
8-4	Email, New Whole Foods Order	US-0022194		
8-5	Email, New Order-Dan's Wellness Pharmacy	US-0022305		
8-6	Email, packages	US-0022585		
8-7	Email, stuff	US-0023748		
8-8	Email, bee calls	US-0023755		
8-9	Email, Bees	US-0024483		
8-10	Email, Nuc order	US-0026005		
8-11	Email, Bees	US-0026389		
8-12	Email, Package bee orders	US-0026766		
8-13	DHA Employment Application	US-0005411-5413		
8-14	DHA Letter to Mattiaccio (5/16/2012)	US-0005440		
8-15	DHA Letter to Mattiaccio (5/30/2012)	US-0005443-5444		
8-16	DHA Earnings Statements	US-0005535-5564		
8-17	DHA Timesheets	US-0005565-5577		
8-18	DHA Group W-2 (2011)	US-0005578-5580		
8-19	DHA Group W-2 (2012)	US-0005581-5583		
8-20	Mattiaccio Resume from Department of Veteran's Affairs Records	US-00015964-15969		

<u>Court Records</u>			
9-1	Certified Copy of EDVA misdemeanor conviction for false advertising or misuse of names to indicate Federal agency (2003)	US-00039562-39546	
9-2	Certified Copy of Prince William County conviction for felony obtaining money by false pretenses (2005)	US-00037431-37434	
9-3	Stafford County Circuit Court Complaint Mattiaccio v. Bjorkman (12/2/2015)	US-0005819-5822	
9-4	EDVA Criminal Information 1:03-M-1321-	US-0005584	
9-5	EDVA Plea Agreement Statement of Facts 1:03-M-1321	US-0005586-5596	
9-6	G. Mattiaccio EDVA bankruptcy petition (1997)		
9-7	S. Mattiaccio EDVA bankruptcy filings (petition and pleadings) (2013)		
	<u>Tax Records</u>		
10-1	Certified copy of 2012 Tax Return		
10-2	Certified copy of 2013 Tax Return		
10-3	Certified copy of 2014 Tax Return		
10-4	Certified copy of 2015 Tax Return		
	<u>Credit Card Records</u>		
11-1	Capital One Application Information & Transaction Search Results (Account x3632)	US-0005912-5915	
11-2	Capital One Statements (Account x3632)	US-0005916-5999	
11-3	Capital One Application Information & Transaction Search Results (Account x5431)	US-0006000-6005	
11-4	Capital One Statements (Account x5431)	US-0006006-6126	
11-5	Capital One Certification of Authenticity of Business Records	US-0035238	
11-6	Chase Statements (Account x2228)	US-0035255-35292	
11-7	Chase Statements (Account x6361)	US-0035294-35332	
11-8	Chase Certification of Authenticity of Business Records	US-0035253	

	<u>USAA Federal Savings Bank Records</u>		
12-1	USAA Federal Savings Bank Statements & Signature Cards (Accounts x181 and x203)	US-0014662-14933	
12-2	USAA Federal Savings Bank Certification of Authenticity of Business Records	US-0014660	
	<u>Social Media & Public Source Records</u>		
13-1	Rock Hill Honey Bee Farms Facebook page screenshots	US-0005897-5911	
13-2	Rock Hill Honey Bee Farms website screenshots		
13-3	DC Honey Bees website screenshots		
	<u>PayPal & Square Records</u>		
14-1	PayPal records, intercrime2@yahoo.com	US-0008736-8752	
14-2	PayPal records, jmattiaccio@richmondgroupintl.com	US-0008753-8802	
14-3	Square records	US-0005828 & US-0005829	
14-4	Square Certification of Authenticity of Business Records	US-00035681	
14-5	PayPal Certification of Authenticity of Business Records	US-0038632	
	<u>Rock Hill Honey Beekeeping Course Records</u>		
15-1	Rock Hill Basic Beekeepers Course Registration Form (3/28/2015)	US-0038778-38779	
15-2	Bee Diseases Short Course PowerPoint	US-0038781-38823	
15-3	Rock Hill Honey Bee Farms PowerPoint, Beginning Beekeeping Class	US-0038890-38936	
15-4	The Colony and Its Organization Handout	US-0038937-38943	
15-5	Northern Virginia Honeybee Annual Cycle Handout	US-0038878-38889	
15-6	Rock Hill Honey Bee Farms Managing Your Nucs Handout	US-0038870-38877	
15-7	Hive Inspection Checklist	US-00039354	
15-8	VDACS Bee Grant	US-00039472 - 39475	

15-9	Email thread, FW: Thank you for your order	US-0038955-38957		
15-10	Email thread, FW Bees – Been trying to reach you	US-0038954		
15-11	Email thread, FW Beekeeping Class Roster (3/28/2015)	US-0038952-38953		
15-12	Email thread, FW Bee Keeping Class	US-0038948-38951		
15-13	Email thread, FW Bee Box	US-00039563-39564		
15-14	Email, FW: Basic Beekeeper Course	US-00039349-39351		
15-15	Email thread, FW Basic Beekeeping Class	US-00039352		
15-16	Email thread, FW Bee Class Materials	US-0038824-38825		
15-17	Email thread, FW Bee Class Materials (Lilly version)	US-0039353		
15-18	Email thread, FW: Thank you for your order (Lilly version)	US-00039485-39487		
15-19	Email thread, FW: Your Payment to Rock Hill HoneyBee Farms, Inc.	US-00039488-39489		
15-20	Email thread, FW: Basic Beekeeping Class – March 28, 2015	US-00039352		
15-21	Email thread, FW: Beekeeping Class Roster	US-00039478-39479		
15-22	Email thread, FW: Re: Beekeeping Class Roster	US-00039480-39482		
	<u>Virginia Department of Agriculture Beekeeping Meeting Records</u>			
16-1	Agenda: VDACS Listening Sessions – Voluntary Pollinator Protection Plan	US-0039305		
16-2	Virginia State Managed Pollinator Protection Plan, Stakeholder Listening Sessions	US-0039306-39321		
	<u>Invoices</u>			
17-1	VP Queens of Frederick, Maryland Invoice	US-0038637-38640		
	<u>Summary Charts</u>			
18-1	Bank of America January 2012-May 2016 Monthly Gross Income			

18-2	Mattiaccio Title II Disability Benefits Payments			
18-3	Whole Foods Payments to Rock Hill Honey Bee Farms			

Respectfully submitted,

DANA J. BOENTE
United States Attorney

By: _____/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of January, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

By: _____/s/
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